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# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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UNITED STATES OF AMERICA

v.

TERRILL ANTWAUN RAY (2) a.k.a. Terrill Antwuan Ray BRANDON MONTREI CHANDLER (3) Case No. 3:19-CR-00158-N (Supersedes indictments returned on March 27, 2019, June 11, 2019 and January 28, 2020)

## THIRD SUPERSEDING INDICTMENT

The Grand Jury Charges:

#### Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance (Violation of 21 U.S.C. § 846)

Beginning in or about June 2018, the exact date being unknown to the Grand Jury, and continuing to May 20, 2019, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, Terrill Antwaun Ray, a.k.a. Terrill Antwuan Ray and Brandon Montrei Chandler, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree with each other and with other persons both known and unknown to the Grand Jury, to commit certain offenses against the United States, to-wit: to possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A)(vi).

All in violation of 21 U.S.C. § 846.

# Count Two Possession with Intent to Distribute a Controlled Substance (Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A))

On or about January 11, 2019, in the Dallas Division of the Northern District of Texas, the defendant, **Terrill Antwaun Ray**, a.k.a. **Terrill Antwuan Ray**, did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A)(vi).

### Count Three

Possession with Intent to Distribute a Controlled Substance and Aiding and Abetting (Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A) and 18 U.S.C. § 2)

On or about March 5, 2019, in the Dallas Division of the Northern District of Texas, the defendant, **Terrill Antwaun Ray**, a.k.a. **Terrill Antwaun Ray**, aided and abetted by another individual, did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A)(vi) and 18 U.S.C. § 2.

#### **Count Four**

Possession with Intent to Distribute a Controlled Substance (Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A))

On or about May 20, 2019, in the Dallas Division of the Northern District of Texas, the defendant, **Terrill Antwaun Ray**, a.k.a. **Terrill Antwaun Ray**, did knowingly and intentionally possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(A)(vi).

#### Count Five

Possessing a Firearm in Furtherance of a Drug Trafficking Crime (Violation of 18 U.S.C. § 924(c)(1)(A)(i))

On or about May 20, 2019, in the Dallas Division of the Northern District of Texas, the defendant, **Terrill Antwaun Ray**, a.k.a. **Terrill Antwaun Ray**, in furtherance of the commission of a drug trafficking crime, namely, conspiracy to possess with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), as alleged in Count One, and possession with the intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), as alleged in Count Four of this indictment, for which he may be prosecuted in a court in the United States, did knowingly possess a firearm, to-wit: a Spike's Tactical, Model SL15, 7.62x39 caliber rifle.

In violation of 18 U.S.C. § 924(c)(1)(A)(i).

## Forfeiture Notice

(21 U.S.C. §§ 853 and 881(a), 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c))

Pursuant to 21 U.S.C. § 853(a), upon conviction of the offense alleged in Count One, Two, Three or Four of this Indictment, the defendants, **Terrill Antwaun Ray**, a.k.a. **Terrill Antwuan Ray**, and **Brandon Montrei Chandler**, shall forfeit to the United States any property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as a result of the respective offense, and any of the defendants' property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the respective offense, including but not limited to the following:

- (1) \$426.93 in U.S. Currency seized on or about May 20, 2019, from Terrill Antwaun Ray, the driver of a 2018 silver BMW sedan, in Dallas, Texas;
- (2) \$10,550.00 in U.S. Currency seized on or about May 20, 2019, from Terrill Antwaun Ray at 6028 Golden Gate Circle, in Dallas, Texas;
- (3) A Spike's Tactical, model SL15, 7.62x39 caliber rifle, bearing serial number SAR13016, including any ammunition, magazines, and/or accessories, seized on or about May 20, 2019, from Terrill Antwaun Ray at 6028 Golden Gate Circle, in Dallas, Texas; and
- (4) One SCCY, model CPX-2, 9mm caliber pistol, bearing serial number 367412, including any ammunition, magazines, and/or accessories, seized on or about May 20, 2019, at 6028 Golden Gate Circle, Dallas, Texas.

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction for the offense alleged in Count Five, defendant, **Terrill Antwaun Ray**, a.k.a. **Terrill Antwuan Ray**, shall forfeit to the United States any firearm and ammunition involved in or used in the knowing commission of the offense, including but not limited to the following:

(1) A Spike's Tactical, Model SL15, 7.62x39 caliber rifle, bearing serial number SAR13016, including any ammunition, magazines, and/or accessories, seized on or about May 20, 2019, from Terrill Antwaun Ray at 6028 Golden Gate Circle, in Dallas, Texas.

Pursuant to 21 U.S.C. § 853(p), if any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States intends to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL

FOREPERSON

CHAD E. MEACHAM UNITED STATES ATTORNEY

I/INDA REQUENEZ
Assistant United States Attorney
Texas State Bar No. 00795609

1100 Commerce Street, Third Floor

Dallas, Texas 75242-1699 Telephone: 214.659.8600

# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

### THE UNITED STATES OF AMERICA

v.

# TERRILL ANTWAUN RAY (02) A.K.A. TERRIL ANTWUAN RAY BRANDON MONTREI CHANDLER (03)

#### THIRD SUPERSEDING INDICTMENT

21 U.S.C. § 846 Conspiracy to Possess with Intent to Distribute a Controlled Substance (Count 1)

21 U.S.C. § 841(a)(1) and (b)(1)(A)
Possession with Intent to Distribute a Controlled Substance
(Count 2 and 4)

21 U.S.C. § 841(a)(1) and (b)(1)(A) and 18 U.S.C. § 2
Possession with Intent to Distribute a Controlled Substance and Aiding and Abetting
(Count 3)

18 U.S.C. § 924(c)(1)(A)(i)
Possessing a Firearm in Furtherance of a Drug Trafficking Crime
(Count 5)

21 U.S.C. §§ 853 and 881(a), 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c) Forfeiture Notice

5 Counts

A true bill rendered	27/
DALLAS	FOREPERSON

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Filed in open court this <u>23</u> day of Febru	ary, 2022.			
No Warrant Needed	·			
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UNITED STATES MAGISTRATE JUDGE Magistrate Court Number: 3:19-MJ-460-BT